

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

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PLLC*

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

**STATEMENT OF ISSUES, DESIGNATION OF ITEMS TO BE INCLUDED IN THE
RECORD ON APPEAL, AND CERTIFICATE REGARDING TRANSCRIPTS**

Aylstock, Witkin, Kreis & Overholtz, PLLC (“Appellant”) hereby provides, pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the following statement of issues, designation of the items to be included in the record, and certificate regarding transcripts in

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

connection with AWKO's *Notice of Appeal* [Docket No. 1651]. As set forth in the Notice of Appeal, Appellant appeals from: (i) the *Order Denying Motions to Dismiss* [Docket No. 1603] (the "MTD Order"), entered on March 2, 2022, and the related *Memorandum Opinion* [Docket No. 1572] (the "MTD Opinion"), entered on February 25, 2022 and (ii) the *Order (I) Declaring that Automatic Stay Applies to Certain Actions Against Non-Debtors and (II) Preliminarily Enjoining Certain Actions* [Docket No. 1635] ("Stay Order" and together with the MTD Order, the "Orders"), entered on March 7, 2022, and the related *Memorandum Opinion* [Adv. Pro. No. 21-03032, Docket No. 184] (the "Stay Opinion" and together with the MTD Opinion, the "Opinions"), entered on February 25, 2022.

I. STATEMENT OF ISSUES ON APPEAL

1. Did the Bankruptcy Court err in the denying the motions to dismiss for cause under 11 U.S.C. § 1112(b)?
2. Did the Bankruptcy Court err in allowing the Debtor and the holder of the Debtor's equity to utilize a divisional merger followed by a chapter 11 filing to isolate a specific class of creditor claims to be dealt with in bankruptcy rather than litigated in the tort system, when all other creditors of the enterprise remain outside of bankruptcy and are being paid in full in the ordinary course?
3. Did the Bankruptcy Court err in allowing the Debtor and the holder of the Debtor's equity to utilize a divisional merger followed by a chapter 11 filing to benefit the holders of equity interests at the expense of a specific class of creditors whose claims are superior in priority?
4. Did the Bankruptcy Court err in allowing the Debtor and the holder of the Debtor's equity to utilize a divisional merger followed by a chapter 11 filing to circumvent the ordinary and customary rules applicable to bankruptcy cases?

5. Did the Bankruptcy Court err in ruling that it has the authority to issue a channeling injunction for an asbestos-related bankruptcy case under 11 U.S.C. § 105 if the specific requirements of 11 U.S.C. § 524(g) are not satisfied?

6. Did the Bankruptcy Court err in ruling that the Debtor satisfies the requirements of 11 U.S.C. § 524(g)(2)(B)(i)(I) even though the Debtor was not “named as a defendant in personal injury, wrongful death, or property-damage actions” as of the petition date?

7. When considering whether this case was filed in good faith, did the Bankruptcy Court err in considering the assets and liabilities of a no-longer-existent non-debtor?

8. Did the Bankruptcy Court err in declaring that the automatic stay under 11 U.S.C. § 362 applies to non-debtors Johnson & Johnson and Johnson and Johnson Consumer Inc., as well as hundreds of other non-debtors?

9. Did the Bankruptcy Court err in granting a preliminary injunction enjoining all talc-related suites against non-debtors Johnson & Johnson and Johnson and Johnson Consumer Inc., as well as hundreds of other non-debtors?

II. DESIGNATION OF RECORD ON APPEAL

Appellant hereby designates the following items to be included in the record on appeal, which includes all exhibits and addenda attached thereto and file therewith and all documents incorporated therein:

Case No. 21-30589		
Filing Date	Docket No.	Item
10/14/2021	1	Voluntary Petition Under Chapter 11
10/14/2021	3	Informational Brief of LTL Management LLC
10/14/2021	5	Declaration of John K. Kim in Support of First Day Pleadings

Case No. 21-30589		
Filing Date	Docket No.	Item
10/14/2021	7	Debtor's Motion for an Order: (I) Authorizing It to File a List of the Top Law Firms with Talc Cases Against the Debtor in Lieu of the List of the 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures for Talc Claimants; and (III) Approving the Form and Manner of Notice of Commencement of this Case
10/14/2021	8	Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims
10/18/2021	44	Debtor's Emergency Motion to Enforce the Automatic Stay Against Talc Claimants who Seek to Pursue Their Claims Against the Debtor and Its Non-Debtor Affiliates
10/18/2021	51	Objection To (A) Debtor's Motion For An Order: (I) Authorizing It To File A List Of The Top Law Firms With Talc Cases Against The Debtor In Lieu Of The List Of The 20 Largest Unsecured Creditors; (II) Approving Certain Notice Procedures For Talc Claimants; And (III) Approving The Form And Manner Of Notice Of Commencement Of This Case; And (B) Debtor's Motion For Entry Of An Order Establishing Certain Notice, Case Management And Administrative Procedures filed by Thomas W. Waldrep Jr. on behalf of Maune Raichle Hartley French & Mudd, LLC
10/18/2021	52	Objection To Debtor's Motion For An Order Authorizing Establishment Of A Qualified Settlement Fund For Payment Of Talc Claims filed by Thomas W. Waldrep Jr. on behalf of Maune Raichle Hartley French & Mudd, LLC
10/18/2021	53	Objection To Debtor's Emergency Motion To Enforce The Automatic Stay Against Talc Claimants Who Seek To Pursue Their Claims Against The Debtor And Its Non-Debtor Affiliates filed by Thomas W. Waldrep Jr. on behalf of Maune Raichle Hartley French & Mudd, LLC
10/19/2021	67	Limited Omnibus Objection Of The MDL Plaintiffs' Steering Committee To The Debtor's First Day Motions filed by Cole Hayes on behalf of The Plaintiffs Steering Committee in the In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation

Case No. 21-30589		
Filing Date	Docket No.	Item
10/19/2021	72	Limited Objection And Reservation Of Rights Of The Blue Cross And Blue Shield Association To Debtor's Motion For An Order: (I) Authorizing It To File A List Of The Top Law Firms With Talc Cases Against The Debtor In Lieu Of The List Of 20 Largest Unsecured Creditors; (II Approving Certain Notice Procedures For Talc Claimants; And (III) Approving The Form And Manner Of Notice Of Commencement Of This Case [Dkt. 7] Filed by James H. Henderson on behalf of Blue Cross Blue Shield Association
10/19/2021	76	Motion of the MDL Plaintiffs Steering Committee to Strike Debtors Emergency Motion to Enforce the Automatic Stay, Objection to Scheduling an Emergency Hearing, and in the alternative, Motion to Reconsider Order Scheduling an Emergency Hearing. filed by Cole Hayes on behalf of The Plaintiffs Steering Committee in the In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Multi-District Litigation
10/19/2021	94	Order on Debtor's Ex Parte Motion for Entry of an Order Scheduling an Emergency Hearing on the Motion to Enforce the Automatic Stay and MDL Plaintiffs Steering Committee Ex Parte Motion to Shorten Notice
10/19/2021	103	Aylstock, Witkin, Kreis & Overholtz PLLC'S (I) Objection To Debtor's Ex Parte Motion For An Emergency Hearing; (II) Preliminary Response To Debtor's Emergency Motion To Enforce The Automatic Stay; And (III) Joinder In Related Filings
10/21/2021	128	Adversary case 21-03032. Complaint 71 Debtor's Complaint for Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors or, (II) Preliminarily Enjoining Such Actions and (II) Granting a Temporary Restraining Order Pending a Final Hearing by LTL Management LLC, LTL Management LLC against Those Parties Listed on Appendix A to the Complaint and John and Jane Does 1-1000
10/23/2021	178	Transcript for Hearing/Trial held on 10/20/2021
10/25/2021	205	Motion to Transfer Case To District of New Jersey filed by U.S. Bankruptcy Administrator Office

Case No. 21-30589		
Filing Date	Docket No.	Item
10/25/2021	206	Declaration of Shelley K. Abel in Support of Motion to Transfer Venue filed by U.S. Bankruptcy Administrator Office
10/26/2021	208	Order to Appear and Show Cause Why Venue Should Not be Transferred to Another District
10/28/2021	227	Motion Of The Bankruptcy Administrator To Appoint An Official Committee Of Talc Claimants filed by U.S. Bankruptcy Administrator Office
10/29/2021	235	Motion of the MDL Plaintiffs Steering Committee to Transfer Venue Pursuant to 28 U.S.C. § 1412 and Joinder in Bankruptcy Administrators Motion to Transfer Venue
10/29/2021	240	Limited Objection Of Aleathea Goodins To The Motion Of The Bankruptcy Administrator To Appoint An Official Committee Of Talc Claimants And Request To Be Appointed To The Official Committee Of Unsecured Creditors filed by Rochelle Guiton on behalf of Aleathea Goodins
11/01/2021	249	Opposition of Aylstock, Witkin, Kreis & Overholtz, PLLC to Debtor's Request for Preliminary Injunctive Relief
11/02/2021	278	Response to Motion to Appoint Official Committee of Talc Claimants
11/03/2021	292	Debtor's Omnibus Reply in Support of (I) Motion to Enforce the Automatic Stay and (II) Motion for an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (C) Granting a Temporary Restraining Order Pending a Final Hearing filed by Debtor LTL Management LLC
11/03/2021	293	Debtor's Ex Parte Motion Requesting Authority to Exceed the Maximum Page Limit filed by Matthew L Tomsic on behalf of LTL Management LLC
11/03/2021	301	Order Granting Motion Requesting Authority to Exceed the Maximum Page Limit filed by Debtor LTL Management LLC

Case No. 21-30589		
Filing Date	Docket No.	Item
11/03/2021	312	Response to Order to Show Cause and Motion of Arnold & Itkin LLP on Behalf of Certain TALC Personal Injury Claimants to Transfer Venue of this Chapter 11 Case to the District of Delaware or, if not to that District, the District of New Jersey Pursuant to 28 U.S.C. § 1412 and Rule 1014 of The Federal Rules of Bankruptcy Procedure
11/03/2021	316	Joinder of Arnold & Itkin LLP on Behalf of Certain Talc Personal Injury Claimants to Limited Objection of The William Hart Plaintiffs to the Bankruptcy Administrators Motion to Appoint an Official Committee of Talc Claimants, and Request of Arnold & Itkin LLP on Behalf of Certain Talc Personal Injury Claimants for Adjournment of the Bankruptcy Administrators Motion to Appoint an Official Committee of Talc Claimants Pending Resolution of The Venue OSC
11/05/2021	337	Onderlaw, LLCs Joinder To (I) Bankruptcy Administrators Motion To Transfer Venue and (II) Motion of the MDL Plaintiffs Steering Committee To Transfer Venue Pursuant To 28 U.S.C. § 1412
11/05/2021	340	Kellie Brewer's Response In Support Of Motion Of Bankruptcy Administrator To Transfer Venue Of Bankruptcy Case Pursuant To 28 U.S.C. Sec. 1412 And Fed. R. Bankr. P. 1014(A)(1) In The Interest Of Justice Or For The Convenience Of Parties
11/05/2021	344	Exhibit List from Hearing Held on 11/05/2021
11/05/2021	345	Debtor's Objection to Transfer of Venue
11/05/2021	346	Response Of Aylstock, Witkin, Kreis & Overholtz, PLLC to Order to Show Cause Why Venue Should Not Be Transferred To Another District And Joinder In Certain Related Filings
11/05/2021	347	Response in Support of Motions to Transfer Venue Filed by Thomas W. Waldrep Jr. on behalf of Weitz & Luxenberg P.C., Kazan, McClain, Satterley & Greenwood, PLC, Levy Konigsberg LLP, Maune Raichle Hartley French & Mudd, LLC
11/08/2021	355	Order Appointing the Official Committee of Talc Claimants
11/08/2021	357	Letter from TCC Members re: Pending Motions to Transfer Venue filed by U.S. Bankruptcy Administrator Office

Case No. 21-30589		
Filing Date	Docket No.	Item
11/09/2021	362	Williams Hart Plaintiffs' Joinder to Arnold & Itkin, LLP's Motion to Transfer Venue of this Chapter 11 Case to the District of Delaware, or if not in that District, the District of New Jersey Pursuant to 28 U.S.C. 1412 and Rule 1014 of the Federal Rules of Bankruptcy Procedure Filed by Christopher Damon Layton on behalf of Williams Hart Boundas Easterby, LLP, on behalf of certain personal injury claimants (Williams Hart Plaintiffs)
11/10/2021	409	Exhibit(s) List from Hearing Held on 11/10/2021
11/12/2021	390	Transcript for Hearing/Trial held on 11/4/2021
11/12/2021	391	Transcript for Hearing/Trial held on 11/5/2021
11/12/2021	392	Transcript for Hearing/Trial held on 11/10/2021
11/15/2021	404	Debtor's Ex Parte Application For An Order Authorizing It To Retain And Employ Jones Day As Counsel As Of The Petition Date
11/16/2021	416	Order Transferring Case to the District of New Jersey
11/19/2021	489	Initial Statement of Official Committee of Talc Claimants Respecting Chapter 11 Case filed by Daniel Stolz on behalf of Committee of Talc Claimants
11/19/2021	495	Amended Initial Statement of Official Committee of Talc Claimants Respecting Chapter 11 Case filed by Daniel Stolz on behalf of Committee of Talc Claimants
11/23/2021	541	Application For Retention of Professional Jones Day as Attorney Filed by Paul R. DeFilippo on behalf of LTL Management LLC
11/24/2021	545	Transcript Regarding Hearing Held 11/22/21
11/24/2021	546	Debtor's Motion Pursuant to 11 U.S.C. § 1505 for an Order Authorizing it to Act as Foreign Representative on Behalf of the Debtor's Estate
12/01/2021	632	Motion To Dismiss Case For Other Reasons Re: For Cause Because It Was Not Filed In Good Faith Filed by Daniel Stolz on behalf of Committee of Talc Claimants

Case No. 21-30589		
Filing Date	Docket No.	Item
12/06/2021	728	Missing Document(s): Declaration Under Penalty For Non Individual Debtors, Statement of Financial Affairs For Non-Individuals, Schedules, Summary of Assets and Liabilities for Non-Individuals A/B,D,E/F,G,H, filed by Paul R. DeFilippo on behalf of LTL Management LLC
12/07/2021	729	Transcript regarding Hearing Held
12/08/2021	746	Objection of the Official Committee of Talc Claimants to The Debtor's QSF Motion and Motion to Seal
12/08/2021	747	Limited Objection to and Reservation of Rights of the Official Committee of Talc Claimants to the Debtor's Motion for Authorization to Act as the Estate's Foreign Representative
12/08/2021	750	Omnibus Limited Objection Of Official Committee Of Talc Claimants To Debtor's Retention Applications And Ordinary Course Professionals Motion filed by Daniel Stolz on behalf of Committee of Talc Claimants
12/08/2021	751	Joinder by AWKO Claimants to Objection of the Official Committee of Talc Claimants to the Debtor's QSF Motion
12/08/2021	752	Joinder by AWKO Claimants to Limited Objection and Reservation of Rights of the Official Committee of Talc Claimants to the Debtor's Motion for Authorization to Act as the Estate's Foreign Representative
12/08/2021	753	Objection of Aylstock, Witkin, Kreis & Overholtz, PLLC to Application for Retention of Jones Day
12/08/2021	755	Limited Objection to of the Blue Cross and Blue Shield Association to Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims
12/08/2021	758	Objection of the United States Trustee to Debtor's Application for Retention of Jones Day, Effective as of October 14, 2021
12/09/2021	761	Order Establishing Procedures For Interim Compensation And Reimbursement Of Retained Professionals
12/09/2021	765	Transcript regarding Hearing Held 12/07/21

Case No. 21-30589		
Filing Date	Docket No.	Item
12/09/2021	766	Motion To Dismiss Case For Other Reasons Re: For Cause Because It Was Not Filed In Good Faith Filed by Colin R. Robinson on behalf of Arnold & Itkin LLP
12/10/2021	768	Application re: Entry of Agreed Protective Order Governing Confidential Information By and Between the Talc Creditors' Committee and the Debtor Pursuant to D.N.J. LBR 9021-1(b) Filed by Paul R. DeFilippo on behalf of LTL Management LLC
12/13/2021	809	Debtor's Reply in Support of Motion for an Order Authorizing It to Act as Foreign Representative on Behalf of the Debtor's Estate
12/13/2021	810	Debtor's Omnibus Reply in Support of Professional Retention Applications and Motion Authorizing Retention and Compensation of Ordinary Course Professionals
12/15/2021	832	Application For Retention of Professional Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel Filed by Paul R. DeFilippo on behalf of LTL Management LLC
12/15/2021	843	Motion to Appoint Examiner Filed by Jeffrey M. Sponder on behalf of U.S. Trustee
12/16/2021	846	Transcript Regarding Hearing Held 12/15/21
12/16/2021	854	Order Authorizing The Debtor To Act As Foreign Representative On Behalf Of The Debtors Estate
12/16/2021	857	Order Authorizing Interim Retention Of Jones Day
12/17/2021	870	Order Modifying Order Establishing Procedures For Interim Compensation And Reimbursement Of Retained Professionals. Service of notice of the entry of this order pursuant to Rule 9022 was made on the appropriate parties
12/21/2021	932	Motion for Relief from Stay. Filed by John M. August on behalf of Vincent Hill
12/21/2021	948	Order For Entry of Agreed Protective Order Governing Confidential Information By and Between the Talc Creditors' Committee and the Debtor Pursuant to D.N.J. LBR 9021-1(b)

Case No. 21-30589		
Filing Date	Docket No.	Item
12/22/2021	952	Limited Objection and Reservation of Rights of the New Jersey Coverage Action Plaintiff-Insurers Regarding Debtor's Preliminary Injunction Motion Filing Error- Objection Should Be Docketed In Adversary Case
12/22/2021	955	Objection of Official Committee of Talc Claimants to Application for Retention of Skadden, Arps, Slate, Meager & Flom LLP
12/22/2021	956	Debtor's Objection to Motion to Dismiss Chapter 11 Case
12/22/2021	957	Objection of Aylstock, Witkin, Kreis & Overholtz PLLC to Application for Retention of Skadden Arps Slate Meager & Flom, LLP
12/23/2021	961	Objection of the United States Trustee to Debtor's Application for Retention of Skadden, Arps, Slate, Meagher & Flom LLP, Effective as of October 14, 2021
12/23/2021	965	Notice Of The United States Trustee's Filing Of Reconstituted And Amended: (I) Notice Of Appointment Of Official Committee Of Talc Claimants I; And (II) Notice Of Appointment Of Official Committee Of Talc Claimants II
12/29/2021	1003	Notice of Motion of Aylstock, Witkin, Kreis & Overholtz, PLLC to Dismiss Bankruptcy Case and Joinder in Related Filings
12/29/2021	1011	Letter to the Honorable Michael B. Kaplan filed by Creditor Committee of Talc Claimants
01/04/2022	1061	Debtor's Objection to Vincent Hill's Motion for Order Lifting Preliminary Injunction
01/05/2022	1070	Transcript regarding Hearing Held 12/30/21
01/05/2022	1071	Transcript regarding Hearing Held 01/03/22
01/07/2022	1090	Transcript regarding Hearing Held 01/06/22
01/07/2022	1092	Joinder of Claimants Represented by the Barnes Law Group to Motions Filed by Official Committee of Talc Claimants and Arnold & Itkin LLP to Dismiss the Debtor's Chapter 11 Case

Case No. 21-30589		
Filing Date	Docket No.	Item
01/07/2022	1095	Movant's Reply to Debtor's Objection to His Motion for Order Lifting Preliminary Injunction
01/11/2022	1116	Transcript regarding Hearing Held 01/10/22
01/11/2022	1117	Application re: in Support of Entry of Joint Stipulation and Order Between The Official Committee of Talc Claimants I and The Official Committee of Talc Claimants II Regarding Pleadings Previously Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II
01/12/2022	1118	Transcript regarding Hearing Held 01/11/22
01/12/2022	1127	Motion to Extend Exclusivity Period for Filing a Chapter 11 Plan and Disclosure Statement Filed by Paul R. DeFilippo on behalf of LTL Management LLC
01/18/2022	1186	Order Denying In Part And Granting In Part Vincent Hill's Motion For Order Lifting Preliminary Injunction
01/18/2022	1190	Debtor's Reply in Support of Its Application to Retain Jones Day as Chapter 11 Counsel
01/19/2022	1199	Transcript regarding Hearing Held 01/14/22
01/20/2022	1211	Transcript regarding Hearing Held 01/19/22
01/21/2022	1226	Joint Stipulation And Agreed Order Between The Official Committee Of Talc Claimants I And The Official Committee Of Talc Claimants II Regarding Pleadings
01/21/2022	1227	Surreply of Official Committee of Talc Claimants I to Jones Day Retention Application
01/21/2022	1228	Amended Surreply of Official Committee of Talc Claimants I to Jones Day Retention Application
01/21/2022	1231	Sur-Reply of Aylstock, Witkin, Kreis & Overholtz, PLLC in Further Support of Its Objection to the Debtor's Application for Retention of Jones Day

Case No. 21-30589		
Filing Date	Docket No.	Item
01/21/2022	1235	Reply in Support of Debtor's Application For Retention of Skadden, Arps, Slate, Meagher & Flom LLP, Effective As of October 14, 2021
01/25/2022	1255	Transcript regarding Hearing Held 01/24/22
01/25/2022	1257	Transcript regarding Hearing Held 01/24/22 Revised
01/25/2022	1265	Memorandum Of Law In Support Of Motion For Leave To File Brief Of <i>Amici Curiae</i> By Certain Law Professors
01/26/2022	1269	Arnold & Itkin LLP's Limited Objection to and Reservation of Rights with Regard to Debtor's Motion for Entry of an Order Pursuant to 11 U.S.C. § 1121(d) Extending the Exclusive Periods to File a Plan of Reorganization and Solicit Acceptances Thereof
01/26/2022	1270	Transcript regarding Hearing Held 01/25/22
01/28/2022	1294	Order Amending Order Authorizing Interim Retention Of Jones Day
01/31/2022	1317	Motion re: For Leave To File <i>Amici Curiae</i> Brief Filed by Jonathan I. Rabinowitz on behalf of J. Maria Glover
01/31/2022	1323	Memorandum Of Law Of <i>Amicus Curiae</i> By Erwin Chemerinsky In Support Of Motion Of The Official Committee Of Talc Claimants To Dismiss Debtor's Chapter 11 Case. Interest Of <i>Amicus Curiae</i> Filed by E. Richard Dressel on behalf of Erwin Chemerinsky
02/02/2022	1344	Debtor's Objection To Motions For Leave To File Briefs Of <i>Amici Curiae</i>
02/03/2022	1352	Transcript regarding Hearing Held 02/02/22
02/03/2022	1354	Reply in Support of Motion to Dismiss Bankruptcy Case [REDACTED] filed by Colin R. Robinson on behalf of Arnold & Itkin LLP
02/03/2022	1356	Motion to Seal re: Reply in Support of Motion to Dismiss Bankruptcy Case and Related Exhibits. Filed by Colin R. Robinson on behalf of Arnold & Itkin LLP
02/03/2022	1357	Reply of the Official Committee of Talc Claimants I in Support of Motion to Dismiss Debtor's Chapter 11 Case

Case No. 21-30589		
Filing Date	Docket No.	Item
02/03/2022	1358	Official Committee of Talc Claimants II's Reply in Support of Motion to Dismiss
02/03/2022	1359	Motion for Temporary Restraining Order and Preliminary Injunction to Prevent Reuters from Publicizing Confidential Documents Subject to a Protective Order Filed by Kenneth A. Rosen, Paul R. DeFilippo on behalf of Johnson & Johnson, Johnson & Johnson and Johnson & Johnson Consumer Inc., LTL Management LLC
02/04/2022	1365	Objection of the United States of America to Debtor's Motion for an Order Authorizing Establishment of a Qualified Settlement Fund for Payment of Talc Claims
02/04/2022	1371	Transcript regarding Hearing Held 02/03/22
02/04/2022	1378	Order Authorizing Interim Retention Of Skadden, Arps, Slate, Meagher & Flom LLP
02/04/2022	1384	Memorandum Of Law Of <i>Amicus Curiae</i> By Certain Law Professors In Support Of Motion Of The Official Committee Of Talc Claimants To Dismiss Debtor's Chapter 11 Case
02/06/2022	1396	Memorandum of Law of Amicus Curiae by Erwin Chemerinsky in Support of Motion of the Official Committee of Talc Claimants to Dismiss Debtor's Chapter 11 Case filed by E. Richard Dressel on behalf of Erwin Chemerinsky
02/07/2022	1405	Order Extending The Exclusive Periods To File A Plan Of Reorganization And Solicit Acceptances Thereof
02/07/2022	1410	Memorandum of Law of Amici Curiae by Certain Complex Litigation Law Professors in support of filed by Jonathan I. Rabinowitz on behalf of J. Maria Glover
02/08/2022	1432	Canadian Class Action Plaintiffs' Opposition to Motions to Dismiss Chapter 11 Case
02/09/2022	1444	Debtor's Sur-Reply in Opposition to Motions to Dismiss Chapter 11 Case
02/10/2022	1457	Joint Response of TCC I & TCC II to the Canadian Class Action Plaintiffs' Opposition to Motions to Dismiss Chapter 11 Case

Case No. 21-30589		
Filing Date	Docket No.	Item
02/11/2022	1464	Transcript regarding Hearing Held 02/10/22
02/11/2022	1465	Corrected Memorandum of Law of Amici Curiae in Support of Committee's Motion to Dismiss filed by Steven B Smith on behalf of The Amici Professors
02/11/2022	1467	Canadian Class Action Plaintiffs' Clarification Based Upon Committee Response
02/15/2022	1481	Transcript regarding Hearing Held 02/14/22
02/16/2022	1494	Transcript regarding Hearing Held 02/15/22
02/17/2022	1516	Joint Stipulation And Agreed Order Between The Official Committee Of Talc Claimants I, The Official Committee Of Talc Claimants II, And The Debtor Regarding The Evidentiary Record In Preliminary Injunction Adversary Proceeding And Trial On Motions To Dismiss filed by Creditor Committee Official Committee of Talc Claimants II
02/17/2022	1518	Transcript regarding Hearing Held 02/16/22
02/18/2022	1528	Transcript regarding Hearing Held 02/17/22 - AM Session
02/18/2022	1529	Transcript regarding Hearing Held 02/17/22 - PM Session
02/21/2022	1551	Declaration of Amici Professors in Support of Amicus Brief filed by Steven B Smith on behalf of The Amici Professors
02/22/2022	1553	Transcript regarding Hearing Held 02/18/22
02/22/2022	1554	Debtor's Omnibus Response to Amicus Briefs Supporting the Committee's Motion to Dismiss
02/25/2022	1572	Opinion Denying Motions to Dismiss
02/25/2022	1573	Opinion Granting Preliminary Injunction and Resolving Adversary Proceeding in Debtors Favor
03/01/2022	1600	TCC I's (I) Supplemental Objection to Debtor's Applications for Authority to Retain Certain Law Firms, and (II) Objection to Orrick's Retention

Case No. 21-30589		
Filing Date	Docket No.	Item
03/02/2022	1603	Order Denying Motions To Dismiss
03/04/2022	1629	Debtor's Supplemental Reply in Support of Retention Applications
03/07/2022	1635	Order (I) Declaring That Automatic Stay Applies To Certain Actions Against Non-Debtors And (II) Preliminarily Enjoining Certain Actions
03/07/2022	1651	Notice of Appeal. Filed by Paul J. Winterhalter on behalf of Aylstock, Witkin, Kreis & Overholtz, PLLC
03/07/2022	1652	Notice of Appeal. Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II. Appellant Designation due by 03/21/2022
03/07/2022	1653	Notice of Appeal. Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II
03/07/2022	1654	Motion for Request for Certification of Direct Appeal to Circuit Court Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II
03/07/2022	1656	Adversary case 22-01073. Complaint by LTL Management LLC against San Diego County Employees Retirement Association, Individually and on Behalf of All Others Similarly Situated
03/09/2022	1668	Transcript regarding Hearing Held 03/08/22
03/10/2022	1687	Order Granting Application to Employ Professional Skadden, Arps, Slate, Meagher & Flom LLP as Special Counsel. Service of notice of the entry of this order pursuant to Rule 9022 was made on the appropriate parties
03/10/2022	1696	Notice of Appeal. Filed by Daniel Stolz on behalf of Official Committee of Talc Claimants I
03/11/2022	1709	Motion for Request for Certification of Direct Appeal to Circuit Court Filed by Daniel Stolz on behalf of Official Committee of Talc Claimants I
03/11/2022	1710	Notice of Appeal. Filed by Colin R. Robinson on behalf of Arnold & Itkin LLP

Case No. 21-30589		
Filing Date	Docket No.	Item
03/11/2022	1713	Motion re: for Certification of Direct Appeal to the United States Court of Appeals for the Third Circuit Filed by Paul J. Winterhalter on behalf of Aylstock, Witkin, Kreis & Overholtz, PLLC
03/14/2022	1720	Motion for Request for Certification of Direct Appeal to Circuit Court. Filed by Colin R. Robinson on behalf of Arnold & Itkin LLP
03/16/2022	1736	Amended Order Authorizing Retention of Skadden, Arps, Slate, Meagher & Flom LLP
03/16/2022	1746	Notice of Appeal. Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II
03/16/2022	1747	Notice of Appeal. Filed by Arthur Abramowitz on behalf of Official Committee of Talc Claimants II

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
10/21/2021	1	Debtor's Complaint for Declaratory and Injunctive Relief (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors or, (II) Preliminarily Enjoining Such Actions and (II) Granting a Temporary Restraining Order Pending a Final Hearing by LTL Management LLC, LTL Management LLC against Those Parties Listed on Appendix A to the Complaint and John and Jane Does 1-1000
10/21/2021	2	Debtor's Motion for an Order (I) Declaring That the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
10/21/2021	3	Supplemental Declaration of John K. Kim in Support of Debtor's Complaint for Declaratory and Injunctive Relief and Related Motions
10/25/2021	17	Transcript for Hearing/Trial held on 10/22/2021

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
10/26/2021	23	Transcript for Hearing/Trial held on 10/25/2021
10/26/2021	28	Order Regarding Debtor's Motion for an Order (I) Declaring the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions, and (III) Granting A Temporary Restraining Order Pending a Final Hearing
11/01/2021	44	Memorandum of Law of Certain Mesothelioma Claimants as Creditors Opposition to Debtor's Motion for an Order(I) Declaring That The Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
11/01/2021	45	Opposition of Aylstock, Witkin, Kreis & Overholtz PLLC to Debtor's Request for Preliminary Injunctive Relief
11/01/2021	49	The MDL Plaintiffs' Steering Committee's Memorandum of Law in Opposition to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Nondebtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
11/01/2021	50	Onderlaw, LLCs Objection To Debtors (I) Emergency Motion Enforce the Automatic Stay and (II) Motion For Preliminary Injunction; and Joinder To MDL Plaintiffs Steering Committee Memorandum of Law
11/02/2021	52	Joinder of Claimants Represented by The Barnes Law Group to Responses Filed by the MDL Plaintiffs' Steering Committee and Certain Mesothelioma Claimants in Opposition to the Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
11/03/2021	58	Debtor's Omnibus Reply in Support of (I) Motion to Enforce the Automatic Stay and (II) Motion for an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (C) Granting a Temporary Restraining Order Pending a Final Hearing

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
11/03/2021	60	Notice of Filing Amended Appendix A to the Debtor's Complaint for Declaratory and Injunctive Relief
11/02/2021	51	Notice of Filing of Declarations in Support of Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
11/02/2021	52	Joinder of Claimants Represented by The Barnes Law Group to Responses Filed by the MDL Plaintiffs' Steering Committee and Certain Mesothelioma Claimants in Opposition to the Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
11/03/2021	58	Debtor's Omnibus Reply in Support of (I) Motion to Enforce the Automatic Stay and (II) Motion for an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminarily Enjoining Such Actions and (C) Granting a Temporary Restraining Order Pending a Final Hearing
11/03/2021	60	Notice of Filing Amended Appendix A to the Debtor's Complaint for Declaratory and Injunctive Relief
11/12/2021	95	Transcript for Hearing/Trial held on 11/4/2021
11/12/2021	96	Transcript for Hearing/Trial held on 11/5/2021
11/12/2021	97	Transcript for Hearing/Trial held on 11/10/202
11/24/2021	109	Stipulation And Agreed Order Authorizing The Official Committee Of Talc Claimants To Intervene In Preliminary Injunction Adversary
11/24/2021	110	Motion for Withdrawal of Reference
12/08/2021	128	Debtor's Supplemental Memorandum of Law in support of Preliminary Injunction Motion

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
12/20/2021	135	Declaration of Mark W. Rasmussen
12/20/2021	136	Exhibits (continued) to Declaration of Mark W. Rasmussen
12/20/2021	137	Exhibits (continued) to Declaration of Mark W. Rasmussen
12/20/2021	138	Exhibits (continued) to Declaration of Mark W. Rasmussen
12/22/2021	141	Limited Objection and Reservation of Rights of the New Jersey Coverage Action Plaintiff-Insurers Regarding Debtor's Preliminary Injunction Motion
12/22/2021	142	Objection of the Official Committee of Talc Claimants to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final
12/22/2021	143	Opposition of Aylstock, Witkin, Kreis & Overholtz PLLC to Debtor's Request for Preliminary Injunctive Relief
01/05/2022	146	Debtor's Omnibus Reply in Support of Motion for an Order (A) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (B) Preliminary Enjoining Such Actions and (C) Granting A Temporary Restraining Order Pending a Final Hearing
01/11/2022	153	Copy Of District Court Order Denying Motion For Withdrawal Of The Reference
01/12/2022	152	Transcript regarding Hearing Held 01/11/22
01/15/2022	157	Bridge Order Extending Termination Date Of Order Granting The Debtors Request For Preliminary Injunctive Relief
01/19/2022	160	Transcript regarding Hearing Held 01/14/22

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
01/21/2022	162	Copy Of District Court Opinion Of United States District Court Chief Judge Freda L. Wolfson Denying Motion For Withdrawal Of The Reference
01/26/2022	164	Joint Stipulation And Agreed Order Between The Official Committee Of Talc Claimants I, The Official Committee Of Talc Claimants II, And The Debtor Regarding Stipulation And Agreed Order Authorizing The Official Committee Of Talc Claimants To Intervene In Preliminary Injunction Adversary Proceeding.
02/01/2022	166	The Official Committee of Talc Claimants II Reply in Further Objection to Debtor's Motion for an Order (I) Declaring that the Automatic Stay Applies to Certain Actions Against Non-Debtors or (II) Preliminarily Enjoining Such Actions and (III) Granting a Temporary Restraining Order Pending a Final Hearing
02/15/2022	171	Transcript regarding Hearing Held 02/14/22
02/16/2022	173	Transcript regarding Hearing Held 02/15/22
02/17/2022	176	Joint Stipulation And Agreed Order Between The Official Committee Of Talc Claimants I, The Official Committee Of Talc Claimants II And The Debtor Regarding The Evidentiary Record In Preliminary Injunction Adversary Proceeding And Trial On Motions To Dismiss filed by Creditor Committee Official Committee of Talc Claimants II)
02/17/2022	177	Transcript regarding Hearing Held 02/16/22
02/18/2022	179	Transcript regarding Hearing Held 02/17/22 - AM Session
02/18/2022	180	Transcript regarding Hearing Held 02/17/22 - PM Session
02/22/2022	183	Transcript regarding Hearing Held 02/18/22
02/25/2022	184	Opinion Granting Preliminary Injunction and Resolving Adversary Proceeding in Debtors Favor
03/04/2022	187	Order (I) Declaring That Automatic Stay Applies To Certain Actions Against Non-Debtors And (II) Preliminary Enjoining Certain Actions

Adv. Pro. Case No. 21-03032		
Filing Date	Docket No.	Item
03/07/2022	189	Notice of Appeal. Filed by Aylstock, Witkin, Kreis & Overholtz, PLLC
03/07/2022	190	Notice of Appeal. Filed by Official Committee of Talc Claimants II
03/07/2022	191	Motion for Request for Certification of Direct Appeal to Circuit Court Filed by Official Committee of Talc Claimants II
03/10/2022	201	Notice of Appeal. Filed by Official Committee of Talc Claimants I
03/11/2022	202	Exhibits C and D to Notice of Appeal filed by Daniel Stolz on behalf of Official Committee of Talc Claimants I
03/11/2022	205	Motion for Request for Certification of Direct Appeal to Circuit Court Filed by Official Committee of Talc Claimants I
03/11/2022	206	Motion re: to Certify direct Appeal to the United States Court of Appeals for the Third Circuit Filed by Aylstock, Witkin, Kreis & Overholtz, PLLC
03/16/2022	210	Notice of Appeal. Filed by Official Committee of Talc Claimants II

Adv. Pro. Case No. 22-01073		
Filing Date	Docket No.	Item
03/07/2022	1	Complaint by LTL Management LLC against San Diego County Employees Retirement Association, Individually and on Behalf of All Others Similarly Situated
03/07/2022	2	Motion for an Order (I) Preliminarily Enjoining the Prosecution of Putative Securities Class Action and (II) Granting a Temporary Restraining Order Pending a Further Hearing Filed by LTL Management LLC

Adv. Pro. Case No. 22-01073		
Filing Date	Docket No.	Item
03/07/2022	3	Exhibit B - Proposed Order Granting Debtor's Request for Temporary Restraining Order
03/07/2022	4	Declaration of John K. Kim

III. CERTIFICATION REGARDING TRANSCRIPTS

Pursuant to Rule 8009(b)(1) of the Federal Rules of Bankruptcy Procedure, Appellant hereby certifies that it is not ordering any transcripts. All transcripts have been prepared, are filed on the docket, and are designated in the foregoing designation of the record.

DATED: March 21, 2022

Respectfully submitted,

OFFIT KURMAN, P.A.

/s/ Paul J. Winterhalter

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